

Kathleen B. Levitz
Vice President-Federal Regulatory

Suite 900
1133-21st Street, N.W.
Washington, D.C. 20036-3351
202 463-4113
Fax: 202 463-4198
Internet: levitz.kathleen@bsc.bls.com

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W.
Washington, D.C. 20554

RECEIVED
JUN 18 1999
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: CC Docket No. 98-56/ and CC Docket No. 98-121

Dear Ms. Salas:

On June 17, 1999 Bob Blau, Randy New, Bill Stacy, and I, representing BellSouth, met with staff of the Common Carrier Bureau's Policy and Program Planning Division. Division staff attending the meeting included Michael Pryor, Claudia Pabo, Eric Einhorn, John Stanley, and Daniel Shiman. During this meeting, we discussed what would constitute a set of performance measurements and self executing enforcement mechanisms adequate to assure that BellSouth would continue to provide nondiscriminatory access to unbundled network elements and the functionalities provided by its OSS. In making their presentation, the BellSouth representatives used the attached documents.

In accordance with Section 1.1206, I am filing two copies of this notice in both of the proceedings identified above. Please place this notice in the records of both proceedings.

Sincerely,



Kathleen B. Levitz

Attachment

cc: Michael Pryor (w/o attachment)
Claudia Pabo (w/o attachment)
Eric Einhorn (w/o attachment)
John Stanley (w/o attachment)
Daniel Shiman (w/o attachment)

No. of Copies rec'd
List ABCDE

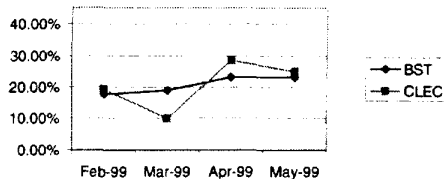
044

BST DRAFT FOR DISCUSSION PURPOSES ONLY

Georgia Metropolitan Statistical Area (MSA) Comparisons
BST vs. CLEC Performance

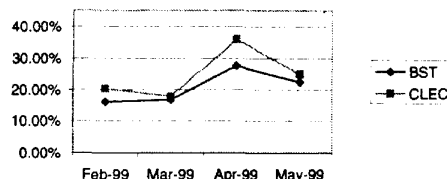
% MISSED REPAIR APPOINTMENTS POTS DISPATCH

ALBANY MSA



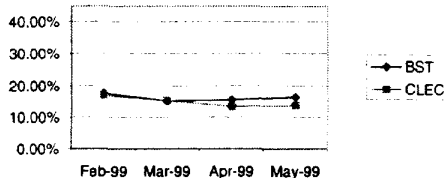
	Feb-99	Mar-99	Apr-99	May-99
BST	17.80%	18.96%	23.18%	23.20%
Volume	826	749	798	901
CLEC	19.40%	9.88%	28.57%	25.00%
Volume	67	81	42	44
Balanced Z			-1.38	

ATHENS MSA



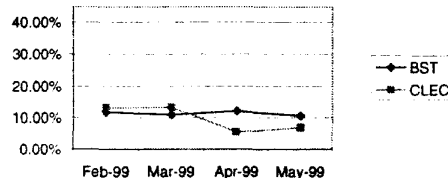
	Feb-99	Mar-99	Apr-99	May-99
BST	16.14%	16.80%	27.69%	22.53%
Volume	849	744	791	972
CLEC	20.41%	18.00%	36.00%	25.00%
Volume	49	50	25	12
Balanced Z			-1.97	

ATLANTA MSA



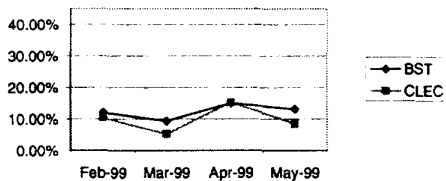
	Feb-99	Mar-99	Apr-99	May-99
BST	17.68%	15.00%	15.45%	16.39%
Volume	30203	30194	32256	36441
CLEC	16.82%	15.11%	13.33%	13.64%
Volume	2420	2508	1028	1122
Balanced Z			1.45	

AUGUSTA MSA



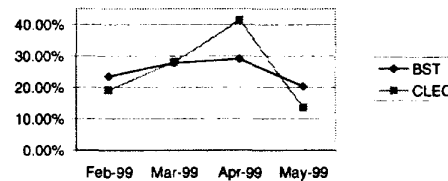
	Feb-99	Mar-99	Apr-99	May-99
BST	11.70%	10.85%	12.00%	10.64%
Volume	2240	2415	2549	2772
CLEC	12.99%	13.18%	5.56%	6.98%
Volume	231	296	90	86
Balanced Z			2.20	

COLUMBUS MSA



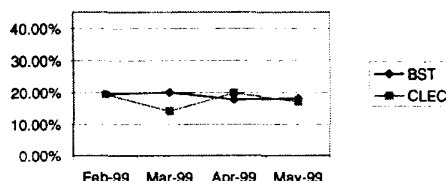
	Feb-99	Mar-99	Apr-99	May-99
BST	12.12%	9.39%	14.98%	13.11%
Volume	2838	2842	2857	3241
CLEC	10.42%	5.31%	15.25%	8.55%
Volume	259	245	118	117
Balanced Z			-0.08	

MACON MSA



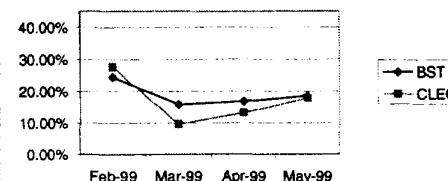
	Feb-99	Mar-99	Apr-99	May-99
BST	23.56%	27.87%	29.12%	20.42%
Volume	1842	1880	1985	1946
CLEC	19.21%	28.06%	41.43%	13.56%
Volume	229	278	70	59
Balanced Z			-2.45	

OUTSIDE MSA



	Feb-99	Mar-99	Apr-99	May-99
BST	19.68%	20.16%	17.86%	18.22%
Volume	6726	6794	7163	7959
CLEC	19.49%	14.15%	19.92%	17.07%
Volume	585	735	251	205
Balanced Z			-0.25	

SAVANNAH MSA



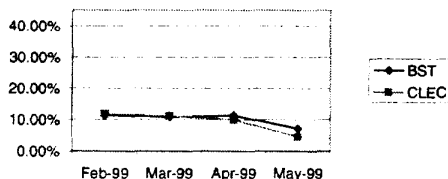
	Feb-99	Mar-99	Apr-99	May-99
BST	24.54%	15.89%	16.79%	18.64%
Volume	1422	1347	1358	1431
CLEC	27.73%	9.65%	13.16%	17.78%
Volume	119	114	38	45
Balanced Z			0.35	

BST DRAFT FOR DISCUSSION PURPOSES ONLY

Georgia Metropolitan Statistical Area (MSA) Comparisons
BST vs. CLEC Performance

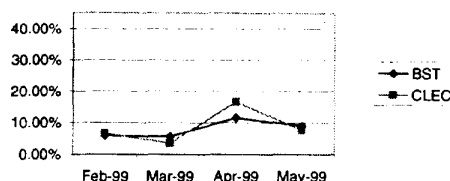
% MISSED REPAIR APPOINTMENTS POTS NON DISPATCH

ALBANY MSA



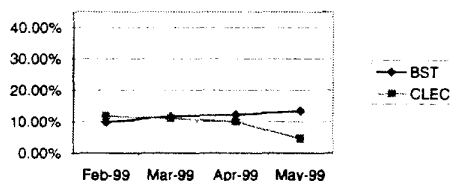
	Feb-99	Mar-99	Apr-99	May-99
BST	11.41%	10.77%	11.25%	7.19%
Volume	631	743	1004	835
CLEC	11.76%	11.11%	10.00%	4.55%
Volume	34	72	20	22
Balanced Z			0.75	

ATHENS MSA



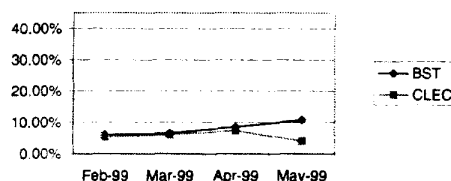
	Feb-99	Mar-99	Apr-99	May-99
BST	5.90%	5.63%	11.56%	9.09%
Volume	644	853	735	726
CLEC	6.67%	3.51%	16.67%	7.69%
Volume	30	57	6	13
Balanced Z			-0.13	

ATLANTA MSA



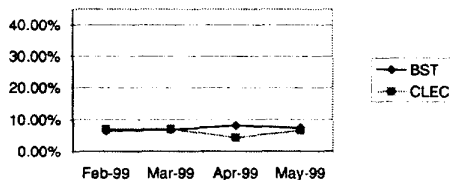
	Feb-99	Mar-99	Apr-99	May-99
BST	9.81%	11.82%	12.24%	13.39%
Volume	25595	30288	30057	32274
CLEC	9.62%	11.17%	7.37%	7.63%
Volume	1580	2158	434	472
Balanced Z			2.76	

AUGUSTA MSA



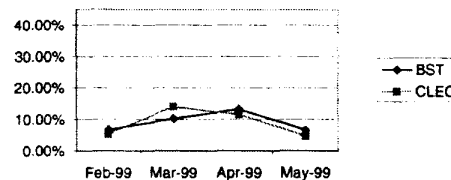
	Feb-99	Mar-99	Apr-99	May-99
BST	6.01%	6.51%	8.58%	10.75%
Volume	1581	1751	2202	2883
CLEC	5.39%	6.02%	7.32%	4.08%
Volume	167	216	41	49
Balanced Z			0.30	

COLUMBUS MSA



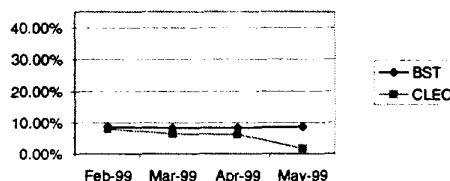
	Feb-99	Mar-99	Apr-99	May-99
BST	6.52%	6.89%	8.12%	7.36%
Volume	1763	1987	2488	2554
CLEC	6.95%	7.03%	4.35%	6.52%
Volume	187	185	46	46
Balanced Z			1.83	

MACON MSA



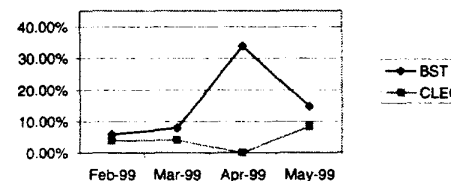
	Feb-99	Mar-99	Apr-99	May-99
BST	6.73%	10.30%	13.31%	6.62%
Volume	1248	1457	1841	1751
CLEC	5.43%	14.06%	11.54%	4.76%
Volume	129	192	26	21
Balanced Z			1.46	

OUTSIDE MSA



	Feb-99	Mar-99	Apr-99	May-99
BST	8.68%	8.40%	8.40%	8.69%
Volume	4400	4860	5395	6252
CLEC	8.10%	6.40%	6.25%	1.87%
Volume	358	453	80	60
Balanced Z			1.42	

SAVANNAH MSA



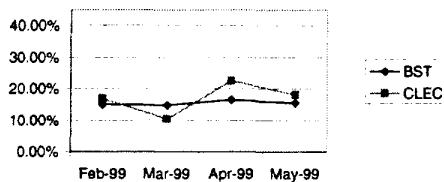
	Feb-99	Mar-99	Apr-99	May-99
BST	5.98%	7.99%	33.86%	14.66%
Volume	1205	1476	1787	1685
CLEC	3.96%	4.17%	0.00%	8.33%
Volume	101	120	15	12
Balanced Z			3.00	

BST DRAFT FOR DISCUSSION PURPOSES ONLY

Georgia Metropolitan Statistical Area (MSA) Comparisons
BST vs. CLEC Performance

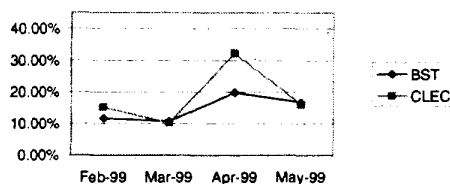
% MISSED REPAIR APPOINTMENTS POTS DISPATCH + NON DISPATCH

ALBANY MSA



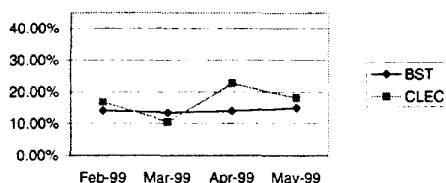
	Feb-99	Mar-99	Apr-99	May-99
BST	15.03%	14.88%	16.54%	15.54%
Volume	1457	1492	1802	1736
CLEC	16.83%	10.46%	22.58%	18.18%
Volume	101	153	62	66
Balanced Z			-0.78	

ATHENS MSA



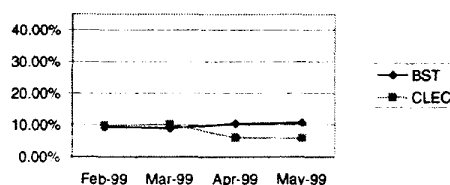
	Feb-99	Mar-99	Apr-99	May-99
BST	11.72%	10.83%	19.92%	16.78%
Volume	1493	1597	1526	1698
CLEC	15.19%	10.28%	32.26%	16.00%
Volume	79	107	31	25
Balanced Z			-1.83	

ATLANTA MSA



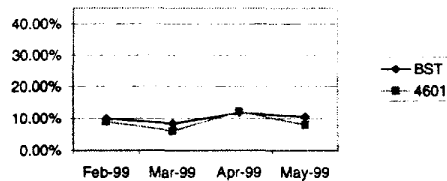
	Feb-99	Mar-99	Apr-99	May-99
BST	14.07%	13.41%	13.90%	14.98%
Volume	55798	60482	62313	68715
CLEC	13.98%	13.29%	11.56%	11.86%
Volume	4000	4666	1462	1594
Balanced Z			2.59	

AUGUSTA MSA



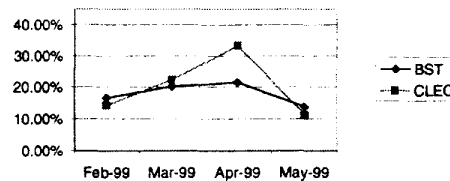
	Feb-99	Mar-99	Apr-99	May-99
BST	9.34%	9.03%	10.42%	10.70%
Volume	3821	4166	4751	5655
CLEC	9.80%	10.16%	6.11%	5.93%
Volume	398	512	131	135
Balanced Z			2.07	

COLUMBUS MSA



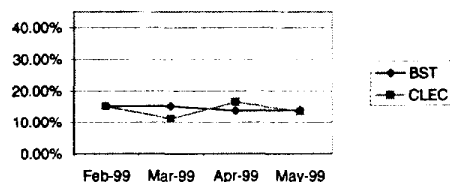
	Feb-99	Mar-99	Apr-99	May-99
BST	9.98%	8.37%	11.79%	10.58%
Volume	4601	4829	5345	5795
CLEC	8.97%	6.05%	12.20%	7.98%
Volume	446	430	164	163
Balanced Z			0.88	

MACON MSA



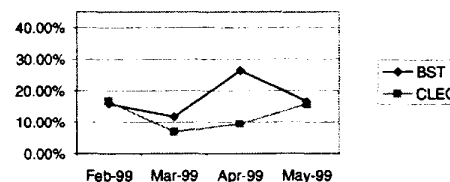
	Feb-99	Mar-99	Apr-99	May-99
BST	16.76%	20.20%	21.51%	13.88%
Volume	3090	3337	3826	3697
CLEC	14.25%	22.34%	33.33%	11.25%
Volume	358	470	96	80
Balanced Z			-1.22	

OUTSIDE MSA



	Feb-99	Mar-99	Apr-99	May-99
BST	15.33%	15.26%	13.79%	14.02%
Volume	11126	11654	12558	14211
CLEC	15.16%	11.20%	16.62%	13.58%
Volume	943	1188	331	265
Balanced Z			0.32	

SAVANNAH MSA



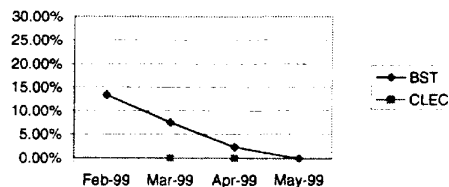
	Feb-99	Mar-99	Apr-99	May-99
BST	16.03%	11.76%	26.49%	16.62%
Volume	2627	2823	3145	3116
CLEC	16.82%	6.84%	9.43%	15.79%
Volume	220	234	53	57
Balanced Z			2.46	

BST DRAFT FOR DISCUSSION PURPOSES ONLY

Georgia Metropolitan Statistical Area (MSA) Comparisons
BST vs. CLEC Performance

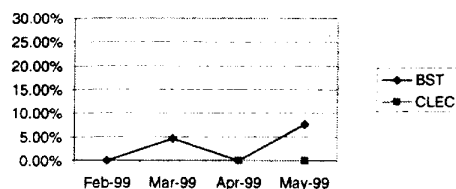
% MISSED REPAIR APPOINTMENTS RESALE DESIGN DISPATCH

ALBANY MSA



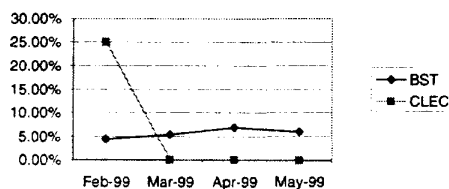
	Feb-99	Mar-99	Apr-99	May-99
BST	13.51%	7.55%	2.38%	0.00%
Volume	37	53	42	25
CLEC		0.00%		
Volume		2		
Balanced Z				

ATHENS MSA



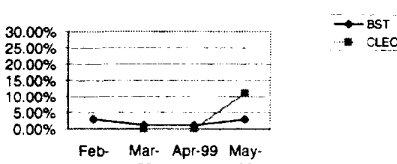
	Feb-99	Mar-99	Apr-99	May-99
BST	0.00%	4.65%	0.00%	7.69%
Volume	15	43	45	39
CLEC				
Volume				
Balanced Z				

ATLANTA MSA



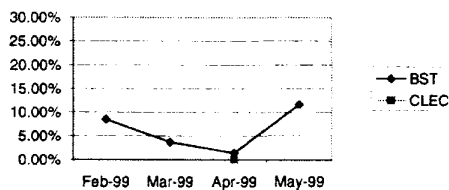
	Feb-99	Mar-99	Apr-99	May-99
BST	4.46%	5.46%	6.91%	6.09%
Volume	718	1025	1086	1133
CLEC	25.00%	0.00%	0.00%	0.00%
Volume	4	4	3	6
Balanced Z				

AUGUSTA MSA



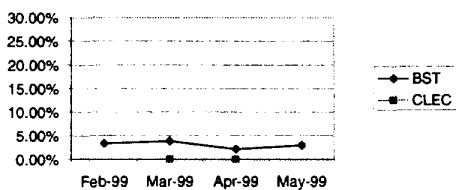
	Feb-99	Mar-99	Apr-99	May-99
BST	2.94%	1.19%	1.16%	2.90%
Volume	68	84	86	69
CLEC		0.00%	0.00%	11.11%
Volume		5	8	9
Balanced Z				

COLUMBUS MSA



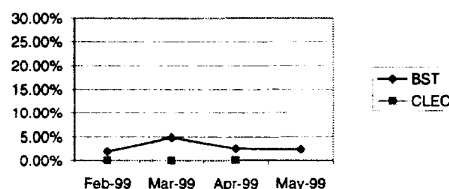
	Feb-99	Mar-99	Apr-99	May-99
BST	8.51%	3.77%	1.49%	11.76%
Volume	47	53	67	68
CLEC			0.00%	
Volume			1	
Balanced Z				

MACON MSA



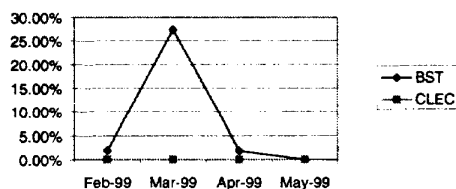
	Feb-99	Mar-99	Apr-99	May-99
BST	3.45%	3.90%	2.20%	2.99%
Volume	58	77	91	67
CLEC		0.00%		
Volume		1		
Balanced Z				

OUTSIDE MSA



	Feb-99	Mar-99	Apr-99	May-99
BST	2.00%	4.94%	2.70%	2.60%
Volume	100	162	148	192
CLEC	0.00%	0.00%	0.00%	0.00%
Volume	1	1	5	
Balanced Z				

SAVANNAH MSA



	Feb-99	Mar-99	Apr-99	May-99
BST	2.04%	27.35%	1.92%	0.00%
Volume	49	373	52	52
CLEC	0.00%	0.00%	0.00%	0.00%
Volume	3	5	2	1
Balanced Z				

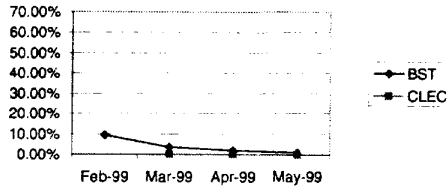
Measures	<p>Pre-Ordering (4)</p> <p>Ordering (2)</p> <p>Provisioning (4)</p> <p>Maintenance and Repair (4)</p> <p>Trunk Blockage (2)</p> <p>LNP (2)</p> <p>Coordinated Customer Conversions (1)</p> <p>Collocation (1)</p> <p>Billing (4)</p>	<p>Pre-Ordering:</p> <p>OSS Interface Availability OSS Interface Response Time Percent Response Received within "X" sec <i>Percent Flow-Through</i></p> <p>Ordering:</p> <p>FOC Timeliness for Mechanized Orders Reject Timeliness for Mechanized Orders</p> <p>Provisioning:</p> <p><i>Average Order Completion Interval</i> <i>Order Completion Interval Distribution</i> Percent Missed Installation Appointments Percent Troubles within 4 Days of Installation</p> <p>Maintenance and Repair:</p> <p>Mean Average Duration Percent Missed Repair Appointments Customer Trouble Report Rate Repeat Troubles within 30 Days</p> <p>Trunk Blockage:</p> <p>Percent End-Office Trunk Blockage Common Transport Trunk Blockage</p> <p>LNP:</p> <p><i>Disconnect Timeliness</i> <i>Percent Missed Installation Appointments</i></p> <p>Coordinated Customer Conversions</p> <p>Collocation:</p> <p>Percent Due Dates Missed</p> <p>Billing:</p> <p>Invoice Timeliness Invoice Accuracy Usage Data Delivery Timeliness Usage Data Delivery Accuracy</p> <p><i>Italicized measures are either underdevelopment or have been modified, and will require 90-days of data to be collected before being placed in remedy pool.</i></p>
Reporting		<p>CLEC Specific CLEC Aggregate BST Aggregate</p> <p>MSA Level Mode of Entry Product Type</p> <p>Field Work Activity (for POTS and UNE Loop & Port Combinations)</p>
Standards	<p>Parity Benchmarks</p>	<p>Parity is the Standard. Statistical testing will only be applied to those measures in the remedy plan.</p> <p>Benchmarks will apply to processes or entry modes where there is no retail analogue.</p>
Parity Model	<p>Jackknife Modified-Z</p> <p>Considering Adjusted LCUG Modified-Z with a Balancing Critical Value</p>	<p>Statistical tests will be performed for each CLEC at the sub-state level for each MSA, mode of entry, product type and field work activity.</p> <p>Statistical test results will be reported for each CLEC at the MSA level only when a statistically valid sample ($n \geq 30$) exists. Results will also be provided at the Aggregate level.</p>

BST DRAFT FOR DISCUSSION PURPOSES ONLY

Georgia Metropolitan Statistical Area (MSA) Comparisons
BST vs. CLEC Performance

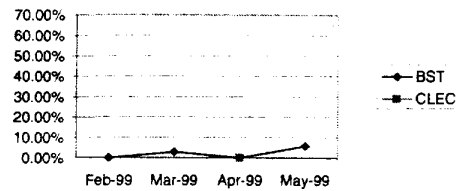
% MISSED REPAIR APPOINTMENTS RESALE DESIGN DISPATCH + NON DISPATCH

ALBANY MSA



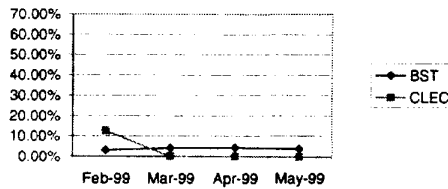
	Feb-99	Mar-99	Apr-99	May-99
BST	9.52%	3.82%	2.00%	1.23%
Volume	63	131	100	81
CLEC		0.00%	0.00%	0.00%
Volume		3	2	1
Balanced Z				

ATHENS MSA



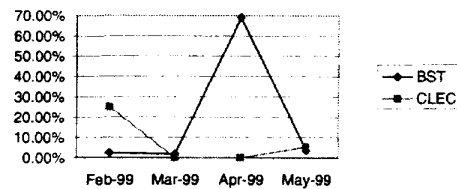
	Feb-99	Mar-99	Apr-99	May-99
BST	0.00%	2.94%	0.00%	6.02%
Volume	51	68	116	83
CLEC			0.00%	
Volume			1	
Balanced Z				

ATLANTA MSA



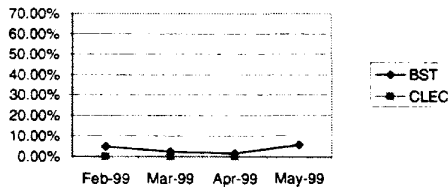
	Feb-99	Mar-99	Apr-99	May-99
BST	3.16%	4.18%	4.39%	4.13%
Volume	1581	2176	2276	2564
CLEC	12.50%	0.00%	0.00%	0.00%
Volume	8	9	10	14
Balanced Z				

AUGUSTA MSA



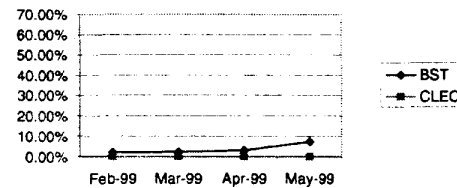
	Feb-99	Mar-99	Apr-99	May-99
BST	2.45%	1.82%	69.00%	3.82%
Volume	183	165	145	131
CLEC	25.00%	0.00%	0.00%	5.56%
Volume	4	8	12	18
Balanced Z				

COLUMBUS MSA



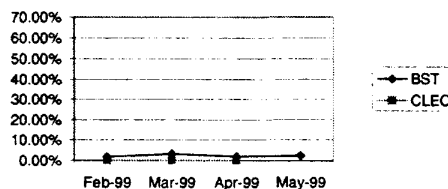
	Feb-99	Mar-99	Apr-99	May-99
BST	4.85%	2.41%	1.50%	5.96%
Volume	103	83	133	151
CLEC			0.00%	
Volume			1	
Balanced Z				

MACON MSA



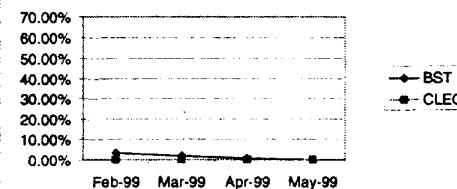
	Feb-99	Mar-99	Apr-99	May-99
BST	2.15%	2.31%	3.11%	7.43%
Volume	93	130	161	148
CLEC	0.00%	0.00%	0.00%	0.00%
Volume	4	5	1	2
Balanced Z				

OUTSIDE MSA



	Feb-99	Mar-99	Apr-99	May-99
BST	1.93%	3.27%	2.10%	2.59%
Volume	207	275	286	347
CLEC	0.00%	0.00%	0.00%	
Volume	2	1	5	
Balanced Z				

SAVANNAH MSA



	Feb-99	Mar-99	Apr-99	May-99
BST	3.39%	2.08%	0.83%	0.00%
Volume	118	144	120	123
CLEC	0.00%	0.00%	0.00%	0.00%
Volume	3	6	4	2
Balanced Z				

<p>Damages and Assessments</p>	<p>Self-Executing</p> <p>Based on performance gaps and variation exceeding a balancing critical value</p> <p>Methodology for Balancing Critical Value to be Negotiated</p> <p>Alternative Hypothesis to be established by the Commission</p>	<ul style="list-style-type: none"> Two-Tiered Structure <p>Tier-1: Payable to CLECs based on Monthly Individual CLEC performance. Processes include:</p> <ul style="list-style-type: none"> Ordering Maintenance and Repair Trunk Blockage LNP Coordinated Customer Conversions Collocation <p>Tier-2: Payable to the State Commission based on Quarterly CLEC Industry performance. Processes include all of Tier-1 plus:</p> <ul style="list-style-type: none"> Pre-Ordering Billing Damages and Assessments will escalate with repeated consecutive failures.
---------------------------------------	--	---

BST PROPOSAL ENHANCEMENTS (6_99)

		SWBT "High" Tiers								VSEEM II									
			Resale POTS, Resale Specials	Resale POTS and UNE Loop & Port Combo	Resale Specials and UNE Loop & Port Combo	UNEs	IC Trunks	LNP	Other	Resale POTS	Resale Design	UNE Loop & Port Combo	UNE Loops	IC Trunks	LNP	Other	V S E E M	BST SQM	
Process	Measures	SWBT SQM	and UNES																
Pre-Ordering	Average Response Interval	X														Tier-2		X	
	Percent Response Received within "X" sec	X														Tier-2		X	
	OSS Interface Availability	X							Tier-2							Tier-2	X	X	
	Order Process Percent Flow-Through	X							Tier-2							Tier-2		X	
	EASE Average Response Time	X																	
Ordering	Percent FOC Received within "X" hrs	X																	
	FOC Timeliness / Average Time to Return FOC	X														Tier-1 Mech		X	
	Speed of Answer in Ordering Center																	X	
	Percent Orders Rejected	X																X	
	Percent Mechanized Rejects Returned within 1 hr	X																	
Provisioning	Average Reject Interval / Mean Time To Return Mechanized Rejects	X														Tier-1 Mech		X	
	Mechanized Provisioning Accuracy	X																	
	Mean (Average) Installation Interval	X	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2		Tier-1 and Tier-2			Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2		Tier-1 and Tier-2				X	
	Average Order Completion Interval																		
	Percent Installations Completed within "X" Days	X				Tier-1 and Tier-2							Tier-1 and Tier-2					X	
	Average Jeopardy Interval																	X	
	Percent Orders Given Jeopardy Notices																	X	
	Average Held Order Interval																	X	
	Held Order Interval Distribution																	X	
	Percent Missed Installation Appointments / Percent Company Caused Missed Due Dates	X	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2				Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2				X	X	
	Percent Company Missed Due Dates Due to Lack of Facilities	X																	
	Average Delay Days for Missed Due Dates Due to Lack of Facilities	X																	
	Average Delay Days for Company Missed Due Dates	X																	
	Percent Company Caused Missed Due Dates > 30 days	X																	
	Count of Orders Canceled After the Due Date which were Company Caused	X																	
	Average Time to Return Mechanized Completions / Average Completion Notice Interval	X																X	
	Percent Mechanized Completions Returned within 1 hr	X																	
	Average Response Time for Loop Make-Up Information	X																	
	Percent Provisioning Troubles within "X" Days of Installation	X	Tier-1 and Tier-2 (10 days)	Tier-1 and Tier-2 (10 days)	Tier-1 and Tier-2 (30 days)	Tier-1 and Tier-2 (30 days)				Tier-1 and Tier-2 (4 days)	Tier-1 and Tier-2 (4 days)	Tier-1 and Tier-2 (4 days)	Tier-1 and Tier-2 (4 days)				X	X	
	Percent No Access (Trouble Reports with no Access)	X																	

BST PROPOSAL ENHANCEMENTS (6_99)

Process	Measures	SWBT SQM	SWBT "High" Tiers							VSEEM II							VSEEM I	BST SQM
			Resale POTS, Resale Specials and UNES	Resale POTS and UNE Loop & Port Combo	Resale Specials and UNE Loop & Port Combo	UNES	IC Trunks	LNP	Other	Resale POTS	Resale Design	UNE Loop & Port Combo	UNE Loops	IC Trunks	LNP	Other		
Maintenance	Customer Trouble Report Rate	X		Tier-1 and Tier-2		Tier-1 and Tier-2				Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2					X
	Percent Missed Repair Commitments / Percent Company Caused Missed Repair Appointments	X		Tier-1 and Tier-2		Tier-1 and Tier-2				Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2				X	X
	Maintenance Average Duration / Receipt to Clear Duration / Average Trunk Restoration Interval	X		Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2				Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2				X
	Out Of Service > 24 hrs / Out of Service < 24 hrs	X																X
	Percent Repeat Troubles within 30 days	X		Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2				Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2	Tier-1 and Tier-2				X	X
	Percent No Access	X																
	Failure Frequency	X																
	OSS Interface Availability																	X
	Average OSS Response Interval																	X
	Average Answer Speed - Repair																	X
Billing	Billing Accuracy / Invoice Accuracy	X														Tier-2		X
	Percent of Accurate and Complete Formatted Mechanized Bills	X							Tier-2									
	Percent of Billing Records Transmitted Correctly	X																
	Billing Completeness	X																
	Billing Timeliness (Wholesale Bills) / Invoice Timeliness (Mean Time To Deliver Invoices)	X							Tier-2							Tier-2	X	X
	Daily Usage Feed Timeliness / Usage Data Delivery Timeliness	X														Tier-2	X	X
	Usage Data Delivery Accuracy															Tier-2		X
	Usage Data Delivery Completeness																	X
	Unbillable Usage	X																
Trunk Blockage	Percent Trunk Blockage / Percent End-Office Trunk Blockage	X					Tier-1 and Tier-2							Tier-1 and Tier-2			X	X
	Common Transport Trunk Blockage	X					Tier-2							Tier-2				X
	Distribution of Common Transport Trunk Groups Exceeding 2%	X																
	Average Trunk Restoration Interval for Service Affecting Trunk Groups	X					Tier-1 and Tier-2							See Maint Average Duration				
INP	Percent Installation Completed within "X" Business Days, where "X" is 3,7,10 days	X																
	Average INP Installation Interval	X																
	Percent INP Trouble Reports within 30 days	X																
	Percent Missed Due Dates	X																

BST PROPOSAL ENHANCEMENTS (6_99)

		SWBT SQM	SWBT "High" Tiers							VSEEM II							V S E E M I	BST SQM
			Resale POTS, Resale Specials and UNES	Resale POTS and UNE Loop & Port Combo	Resale Specials and UNE Loop & Port Combo	UNEs	IC Trunks	LNP	Other	Resale POTS	Resale Design	UNE Loop & Port Combo	UNE Loops	IC Trunks	LNP	Other		
LNP	Percent LNP Due Dates within Industry Guidelines	X																
	Percent of Time the Old Service Provide Releases Subscription prior to the Expiration of the Second 9 hour timer	X																
	Percent of Customer Account Restructured prior to LNP Due Date	X																
	Percent FOCs Received within "X" hours	X																
	FOC Timeliness (Mech and Non-Mech)																	New
	Average Response Time for Non-Mechanized Rejects Returned with Complete and Accurate Codes	X																
	Percent Rejected LSRs (Mech and Non-Mech)																	New
	Percent Premature Disconnects for LNP Orders	X																
	Percent of Time Company Applies the 10-digit trigger prior to the LNP Order Due Date	X						Tier-1 and Tier-2										
	Percent LNP Trouble Reports within 10 days	X						Tier-1 and Tier-2 (10 days)										
	Average Delay Days for Company Missed Due Dates	X																
	Average Time Out of Service for LNP Conversions	X						Tier-1 and Tier-2								See Coordinated Customer Conversions		
	Percent Out of Service < 60 minutes	X																
	Average Time To Activate Port / Disconnect Timeliness	X													Tier-1 and Tier-2			New
	Percent Flow-Through - Mech LSRs																	New
	Percent Missed Installation Appointment														Tier-1 and Tier-2			New
	Total Service Order Cycle Time																	New
Collocations	Percent Missed Collocation Due Dates	X						Tier-1 and Tier-2								Tier-1 and Tier-2	X	X
	Average Delay Days for Company Missed Due Dates	X																
	Percent of Requests processed within the Tariff Timelines	X																
	Average Response Time																	X
	Average Arrangement Time																	X

BellSouth's Second Proposal for Voluntary Self Effectuating Enforcement Mechanisms (VSEEM II) FCC discussion

6/17/1999

CONFIDENTIAL AND PROPRIETARY

Not for use or disclosure outside BellSouth. Not for use by or disclosure to unauthorized personnel.

VSEEM II

- Voluntarily establish enforcement mechanisms acceptable to the FCC as part of a package for 271 approval
- Assumption:
 - FCC will accept enforcement mechanisms and approve a 271 application contingent on these mechanisms being put in place on approval of the 271 application.

VSEEM II

Desired Characteristics

- Not applied until after 271 approval in a specific state
- Designed to prevent BST “backsliding” on CLEC service
- Legally binding (implement through contracts)
- Enforcement mechanisms will be “Meaningful” and “Significant”
- Limited number of measurements, modeled on SWBT’s Tier 1 and Tier 2 “High” measurements
- Statistical or “bright line” test to easily verify “parity”
- CLECs retain rights to file complaints with PSC or FCC

VSEEM II Proposal

- 24 key measures of Timeliness or Quality
- Each measure is tested vs. a retail analog, where applicable
- Benchmarks will be established where no retail analog exists
- A balanced method for statistical validation is included.
- Six CLEC product groups are offered as subcategories (Resale POTS; Resale Design; UNE Loop+Port Combinations; UNE Loops; LNP; and Trunking
- Tier-1 Enforcement Mechanisms are derived from the concept of liquidated damages and are paid directly to the CLECs, while Tier-2 Enforcement Mechanisms are paid directly to the PSC or their designated agency.

VSEEM II Proposal

- Enforcement mechanisms are “triggered” by a parity or benchmark miss in any of the 24 measurements. A test statistic is provided at the MSA level, on an individual CLEC basis for all key measures; provided a statistically valid sample exist.

VSEEM II Proposal

EXAMPLE:

Definitions:

Tier-1 Payment = $\Delta_z * \text{Volume} * \$\$$

Tier-2 Payment =
$$\frac{[(\Delta_{z1} * \text{Volume}_1) + (\Delta_{z2} * \text{Volume}_2) + (\Delta_{z3} * \text{Volume}_3)]}{3}$$

"% to Z" is the Mean, Percent or Rate that would yield a performance result equal to the Critical

Ex A: Percent Missed Due Dates (Tier -1 and Tier-2)

	BST	CLEC1	% to Z	Δ_z
Month1	5%	6%	-	-
Month2	6%	10%	8%	2%
Month3	4%	8%	5%	3%
Month4	5%	9%	7%	2%

	Month1	Month2	Month3	Month4
Tier-1 Payment	-	.02 * 400 * \$\$\$.03 * 500 * \$\$\$.02 * 600 * \$\$\$
Tier-2 Payment				13.7 * \$\$\$

6/17/1999

CONFIDENTIAL AND PROPRIETARY

Not for use or disclosure outside BellSouth. Not for use by or disclosure to unauthorized personnel.

Self Effectuating Enforcement Mechanisms

Summary

- BellSouth's proposal meets all the criteria discussed in our previous meetings
 - “Meaningful” and “Significant”
 - Reasonable number of measurements
 - Outcome Oriented
 - Statistical or “bright line” test to easily verify “parity”
- The proposed measures are simpler and present a more understandable picture of the effect on a CLEC's customer than those enacted or proposed by other ILECs

Definitions:

$$\text{Tier-1 Payment} = \Delta_z * \text{Volume} * \$\$$$

$$\text{Tier-2 Payment} = \frac{[(\Delta_{z1} * \text{Volume}_1) + (\Delta_{z2} * \text{Volume}_2) + (\Delta_{z3} * \text{Volume}_3)]}{3} * \$\$$$

"% to Z" is the Mean, Percent or Rate that would yield a performance result equal to the Critical Value

Ex A: Percent Missed Due Dates

(Tier -1 and Tier-2)

	BST	CLEC1	% to Z	Δ_z	Volume
Month1	5%	6%	-	-	300
Month2	6%	10%	8%	2%	400
Month3	4%	8%	5%	3%	500
Month4	5%	9%	7%	2%	600

	Month1	Month2	Month3	Month4
Tier-1 Payment	-	2 * 400 * \$\$	3 * 500 * \$\$	2 * 600 * \$\$
Tier-2 Payment				1167 * \$\$